

1 HON. RICHARD A. JONES
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**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION**

9 MANDZELA ZHOCELIN-PATRICK a/k/a
10 MANDZELA ZHOSELIN-PATRICK,

11 an Individual,

12 Plaintiff,

13 v.

14 RITZIO PURCHASE LIMITED,

15 a Cyprus company,

16 Defendant.

Case No.:
2:17-cv-00002-RAJ

**PLAINTIFF'S MOTION FOR DEFAULT
AGAINST DEFENDANT RITZIO
PURCHASE LIMITED**

NOTE ON MOTION CALENDAR:
July 20, 2017

18 Pursuant to Rule 55(a) of the Federal Rules of civil Procedure and Local CR Rule 55(a),

19 Plaintiff Mandzela Zhocelin-Patrick hereby moves the Court for entry of default against

20 Defendant Ritzio Purchase Limited. Despite having been served with the Complaint on this

21 matter on June 27, 2017, Defendant has failed to make any contact with Plaintiff's counsel and

22 has failed to file or serve an answer or any other response to the Complaint as of the date hereof,

1 which is more than 21 days since the date of service. This Motion is further based upon the
2 following:

3 1. Defendant Ritzio Purchase Limited is, upon information and belief, a Cyprus
4 company with Corporate ID 144533 and a business address of Diagorou Street 4, Kermia
5 Building, 6th Floor, Office 601, P.C. 1097 in Nicosia, Cyprus. *See* Declaration of Matthew
6 Shayefar [“Shayefar Decl.”], filed herewith, ¶ 2.

7 2. Plaintiffs’ counsel transmitted a copy of the Summons, Complaint, Civil Cover
8 Sheet, Exhibits and this Court’s Standing Order to Process Server Network LLC for service on
9 Defendant at the above referenced address. Shayefar Decl., ¶ 3.

10 3. On June 27, 2017, Process Server Network LLC had the documents served on
11 Defendant’s designated agent to accept service of process at the above referenced address.
12 Shayefar Decl., Exhibit 1.

13 4. Accordingly, Defendant’s answer to the Complaint was due on July 18, 2017.
14 Fed. R. Civ. P. 12(a)(1).

15 5. Since this matter was filed and since Defendant was served, Plaintiff’s counsel
16 has not been contacted by Defendant nor anyone purporting to represent Defendant in this
17 matter. Shayefar Decl., ¶ 5.

18 6. To date, Defendant has not filed an answer to the Complaint or any other response
19 to the Complaint. Shayefar Decl., ¶ 6.

20 Because Defendant has not answered the Complaint, Plaintiff is entitled to a default
21 entered against Defendant in this matter. Accordingly, Plaintiff respectfully requests that the
22 Court enter default against Defendant Ritzio Purchase Limited. A Proposed Order is submitted
23 herewith.

1 Respectfully Submitted this 20th day of July, 2017.

2 /s/ Matthew Shayefar
3 Matthew Shayefar (*pro hac vice*)
4 Valentin Gurvits (*pro hac vice*)
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12 /s/ Philip P Mann
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17 Tel: (206) 436-0900
18 Fax: (866) 341-5140
19 phil@mannlawgroup.com

20 Attorneys for Plaintiff

21 **CERTIFICATE OF SERVICE**

22 I hereby certify that, on the date indicated below, I electronically filed the foregoing with
23 the Clerk of the Court using the CM/ECF system which will send notification of such filing to all
24 parties who have appeared in this matter.

25 Executed July 20, 2017

26 /s/ Matthew Shayefar
27 Matthew Shayefar